

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE:

Pamela Kuykendall

Debtor(s).

Case # 18-25256

Chapter 7

Honorable Pamela S. Hollis

Set for December 21, 2018 at 10:00
a.m.

NOTICE OF MOTION

TO: Attached Service List

PLEASE TAKE NOTICE that on December 21, 2018 at 10:00 a.m., or as soon thereafter as counsel may be heard, I shall appear before the Honorable Pamela S. Hollis at Joliet City Hall, 150 West Jefferson Street, 2nd Floor, Joliet, Illinois, or, in her absence, before any other Judge who may be sitting in her stead, and shall then and there present Trustee's **Motion to Compel**, a copy of which is attached hereto and is hereby served upon you.

/s/ Cindy M. Johnson
Chapter 7 Trustee

Cindy M. Johnson
Chapter 7 Trustee
140 S. Dearborn Street, Suite 1510
Chicago, Illinois 60603
(312) 345-1306

CERTIFICATE OF SERVICE

I, Cindy M. Johnson, an attorney, certify that I served true and correct copies of the foregoing notice and document to which it refers to the persons listed on the attached service list via electronic service on those registered in the CM/ECF system and, for those not listed in the CM/ECF system, at the addresses listed, by placing them in envelopes, properly addressed, with proper postage prepaid, and depositing them in the United States Mail Chute at 140 S. Dearborn Street, Chicago, Illinois at or before 5:00 p.m. on December 7, 2018.

/s/ Cindy M. Johnson

SERVICE LIST

Electronic Mail Notice List

- Robert J Adams RobertJAdams@jubileebk.net,
bankruptcy714@gmail.com;illinoisecf@gmail.com;lake.rjaign@gmail.com;robertjadam
ms@stratusbk.com;bankruptcy713@yahoo.com
- Patrick S Layng USTPRegion11.ES.ECF@usdoj.gov

US Mail

Pamela Kuykendall
2723 Showplace Dr 201
Naperville, IL 60564

IN THE UNITED STATES BANKRUPTCY
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ILLINOIS EASTERN DIVISION

IN RE:

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MOTION TO COMPEL

NOW COMES, Cindy M. Johnson (hereafter, "Trustee"), not individually, but as trustee of the bankruptcy estate of Pamela Kuykendall, and in support of her Motion to Compel, states as follows:

1. On September 7, 2018, Pamela Kuykendall filed a voluntary petition for relief pursuant to Chapter 7 of the United States Bankruptcy Code (hereafter, "Code").
2. Pamela Kuykendall ("Debtor") is the debtor in this case.
3. As a party in interest, Trustee is amply justified in requesting documents and information from a debtor(s) concerning (a) the acts of the debtor(s), (b) the conduct of the debtor(s), (c) the property of the debtor(s), (d) matters which may affect the administration of the debtor's estate, (e) the operation of any business and the desirability of its continuance, and (f) any other matter relevant to the case or the administration of the debtor's estate.
4. If Trustee learns from her examination of a debtor that the debtor's schedules or statement of financial affairs were inaccurately completed, she is justified in requesting that the debtor file an amended document accurately reflecting the particular issue.

5. The Section 341(a) meeting of creditors originally scheduled for October 09, 2018, Debtor was examined by the Trustee and at the conclusion of the meeting the Trustee requested the following

- file an amended Voluntary Petition, checking the box yes to statement 11 reflecting that Debtor rents her residence
- file an amended schedule A/B be amended to reflect the Debtor's security deposit
- file an amended schedule G to disclose Debtor's written residential lease.

6. As of December 6, 2018, the requested amendments have not been made.

WHEREFORE, Cindy M. Johnson, not individually, but as Trustee of the Estate of Pamela Kuykendall asks this Honorable Court to enter to enter an order:

1. Compelling that the Debtor, within fourteen days, to:
 - a. Amend her Voluntary Petition to check the box yes to accurately reflect Debtor's rental interest in her residence.
 - b. Amend Schedule A/B to reflect Debtor's security deposit.
 - c. Amend Schedule G to disclose Debtor's written residential lease
2. Granting such other and further relief as is just and equitable.

Respectfully submitted,
Cindy M. Johnson, not individually, but
as Trustee of the Estate of Pamela
Kuykendall

/s/ Cindy M. Johnson
Chapter 7 Trustee

Cindy M. Johnson
Chapter 7 Trustee
140 S. Dearborn Street, Suite 1510
Chicago, Illinois 60603
(312) 345-1306

